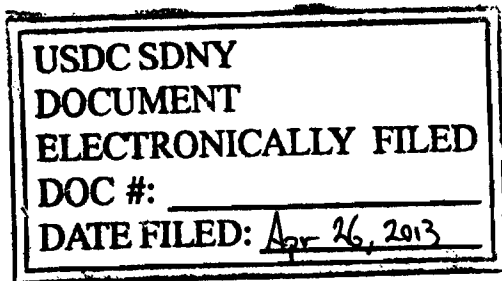




New York | Los Angeles

7 Times Square, New York, NY 10036-6569 Tel: 212-421-4100 Fax: 212-326-0806

www.pryorcashman.com



MEMO ENDORSED

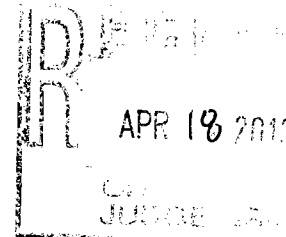
Jacob B. Radcliff
Of Counsel

Direct Tel: 212-326-0471
Direct Fax: 212-798-6316
jradcliff@pryorcashman.com

April 17, 2013

BY HAND

The Honorable Thomas P. Griesa
United States District Court
for the Southern District of New York
500 Pearl Street
New York, New York 10007



Re: Allianz Risk Transfer AG, et al. v. Paramount Pictures Corporation,
No. 08-CV-10420 (TPG)

Dear Judge Griesa:

We are counsel to the Plaintiffs in the above-referenced action, and we write on behalf of all parties to propose a revised discovery schedule for the Court's consideration.

The parties are cooperating in discovery and no party is requesting any intervention or oversight from the Court at this time. The parties have nearly completed all documentary discovery, and are working cooperatively to begin the deposition phase of the case in May 2013. Discovery in this case has been substantially delayed by the delayed production of documents from Bank of America Merrill Lynch, which acted as the lead underwriter for the private placement transaction at issue in this case. Plaintiffs served a third party subpoena on Bank of America Merrill Lynch in May of 2012, and, while hundreds of thousands of documents have been produced, we are still waiting for the final portions of their production.

Given this delay in receiving documents in response the third-party subpoena served on Bank of America Merrill Lynch and the volume of its production, and that the first fact deposition is now scheduled for May 2, the parties agree and propose that the current discovery schedule should be amended as follows:

- the deadline for the parties to disclose the identities of all testifying experts shall be September 20, 2013; and
- the deadline for all fact discovery to be completed shall be September 30, 2013; and



The Honorable Thomas P. Griesa
April 17, 2013
Page 2

- the deadline for the parties to serve all expert reports shall be November 1, 2013; and
- the deadline for the parties to serve any rebuttal expert reports shall be November 22, 2013; and
- all expert discovery shall be completed by December 20, 2013.

If the above is acceptable to the Court, we respectfully request that this letter be so-ordered.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "J.B. Radcliff".

Jacob B. Radcliff

cc: Allan J. Arffa, Esq.
Leslie Gordon Fagen, Esq.
Andrew J. Ehrlich, Esq.
Patrick J. Somers, Esq.
Richard Kendall, Esq.
Robert Klieger, Esq.
Phil Kelly, Esq.
James A. Janowitz, Esq.
(all by email attachment)

SO ORDERED:

A large, stylized handwritten signature in black ink, appearing to read "Thomas P. Griesa".

HON. THOMAS P. GRIESA, USDJ

4/26/13